

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ANN BAKER PEPE,)	
individually and on behalf of all others)	
similarly situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
GENZYME CORPORATION and)	
LABORATORY CORPORATION OF)	
AMERICA HOLDINGS)	
)	
Defendants.)	

Case No.: 1:12-cv-11110-DJC

PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS-ACTION SETTLEMENT

Plaintiff Ann Baker Pepe ("Plaintiff"), on behalf of herself and all others similarly situated, by and through her counsel, respectfully submits this Motion for Final Approval of Class-Action Settlement. In support of this Motion, Plaintiff relies on (1) her Memorandum of Law in Support of Plaintiff's Motion for Final Approval of Class-Action Settlement; (2) the Declaration of Patrick J. Sheehan in Support of Plaintiff's Motion for Final Approval of Class-Action Settlement and Plaintiff's Motion for an Award of Fees and Costs and for an Incentive Award; and (3) the Declaration of James Prutsman, all filed concurrently herewith, as well as the pleadings, legal authorities, facts and other information cited or referred to therein.

WHEREFORE, Plaintiff respectfully requests this Court to grant this Motion for Final Approval of Class-Action Settlement and enter a Final Order and Judgment, in the form attached as Exhibit A hereto.

Dated this the 9th day of December, 2014.

Respectfully submitted,

ANN BAKER PEPE,
By her Attorneys,

WHATLEY KALLAS, LLP

/s/Patrick J. Sheehan

Patrick J. Sheehan (BBO # 639320)

psheehan@whatleykallas.com

WHATLEY KALLAS, LLP

60 State Street, 7th Floor

Boston, MA 02109

Tel: (617) 573-5118

Edith M. Kallas

ekallas@whatleykallas.com

Ilze C. Thielmann

ithielmann@whatleykallas.com

WHATLEY KALLAS, LLP

1180 Avenue of the Americas, 20th Floor

New York, NY 10036

Tel: (212) 447-7060

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document filed through the ECF system, will be served electronically through the ECF System on the email-registered participants as identified on the Notice of Electronic Filing ("NEF") on December 9, 2014.

/s/ Patrick J. Sheehan

Patrick J. Sheehan